UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CITY OF ALMATY, KAZAKHSTAN and BTA BANK JSC,

Crossclaim Plaintiffs,

- against -

MUKHTAR ABLYAZOV, VIKTOR KHRAPUNOV, ILYAS KHRAPUNOV, and TRIADOU SPV S.A.,

Crossclaim Defendants.

ECF Case

No. 1:15-cv-05345 (AJN) (KHP)

TRIADOU SPV S.A.'S NOTICE OF MOTION TO PRECLUDE SMP DOCUMENTS

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law in support of Triadou SPV S.A.'s ("Triadou") motion to preclude the SMP Documents, dated June 18, 2019, Triadou, by and through its undersigned counsel, will move this Court before the Honorable Katharine H. Parker, at the U.S. District Courthouse for the Southern District of New York, 500 Pearl Street, New York, N.Y. 10007, for an order pursuant to Rule 37(c) of the Federal Rules of Civil Procedure and the Court's inherent authority precluding the SMP Documents and awarding Triadou its costs for the motion, and granting to Triadou such other, further, and different relief as the Court deems just and proper.

Dated: New York, New York June 18, 2019 Respectfully submitted,

BLANK ROME LLP

By: s/Deborah A. Skakel
Deborah A. Skakel
Alex E. Hassid
Robyn L. Michaelson
1271 Avenue of the Americas
New York, New York 10020
Telephone: (212) 885-5000
Facsimile: (212) 885-5001
dskakel@blankrome.com
ahassid@blankrome.com
rmichaelson@blankrome.com

Counsel for Crossclaim Defendant Triadou SPV S.A.